

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAUREEN DOWE, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

LEEDS BROWN LAW, P.C., LEEDS
MORELLI & BROWN, P.C., LEEDS
MORELLI & BROWN, LLP, LEEDS &
MORELLI, P.C., LENARD LEEDS, STEVEN
A. MORELLI, JEFFREY K. BROWN,
PRUDENTIAL FINANCIAL INC., parent and
successor in interest to PRUDENTIAL
SECURITIES, INC., ERIC SCHWIMMER,
and JOHN DOES 1-25, fictitious persons and
entities,

Defendants.

Civil No. 18-cv-11633

**NOTICE OF MOTION TO COMPEL
ARBITRATION AND TO DISMISS
THE AMENDED CLASS ACTION
COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 12(b)(6) and 9 U.S.C. § 3, upon the annexed Declaration of Vincent A. Sama, Esq. sworn to on the 20 day of May 2019, and upon the accompanying Memorandum of Law, and upon all pleadings and proceedings had herein, the defendants, Prudential Financial Inc., allegedly parent and successor in interest to Prudential Securities, Inc. and Eric Schwimmer (the “Prudential Defendants”), will move this Court before the Honorable Denise L. Cote, at the United States Courthouse, 500 Pearl Street, New York, NY 10007 on a date convenient to this Court, for an order compelling arbitration and dismissing the amended complaint with prejudice or in the alternative dismissing the amended complaint with prejudice. The basis for the motion is set forth in the accompanying memorandum of law.

Dated: New York, New York
May 20, 2019

/s/ Vincent A. Sama

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